

C. DUKES SCOTT
EXECUTIVE DIRECTOR

1441 Main Street, Suite 300
Columbia, SC 29201



DAN E. ARNETT
CHIEF OF STAFF

Main Line: (803) 737-0800
Legal Department: (803) 737-0877

FLORENCE P. BELSER
GENERAL COUNSEL

July 3, 2007

VIA E-FILING & HAND DELIVERY

Charles L.A. Terreni, Esquire
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Dr., Suite 100
Columbia, SC 29210

Re: Midwestern Telecommunications, Incorporated Application for Designation as an Eligible Telecommunications Carrier for the Purposes of Receiving Federal Universal Service Support Pursuant to Sections 214 (e)(2) of the Telecommunications Act of 1996
Docket No. 2007-32-C

Dear Mr. Terreni:

Enclosed please find the original and one copy of the Office of Regulatory Staff's First Continuing Data Request in the above referenced docket.

Please note that the attached documents are exact duplicates, with the exception of the form of the signature, of the e-filed copy submitted to the Commission in accordance with its electronic filing instructions.

By copy of this letter we are also serving all other parties of record. Please let me know if you have any questions.

Sincerely,

C. Lessie Hammonds

CLH/pjm
Enclosures

cc: John J. Pringle, Jr., Esquire
Margaret M. Fox, Esquire

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2007-32-C

| | | |
|----------------------------------|---|---------------------------------|
| IN RE: Petition of Midwestern |) | OFFICE OF REGULATORY |
| Telecommunications, Inc. for the |) | STAFF'S FIRST CONTINUING |
| Designation as an Eligible |) | DATA REQUEST |
| Telecommunications Carrier |) | |

TO: John J. Pringle, Jr., Esquire, Counsel for Midwestern Telecommunications, Inc.:

Pursuant to S.C. Code Ann. Sections 58-4-10 and 58-4-50, and 26 S.C. Code Regs. 103-833, the Office of Regulatory Staff hereby serves the following Data Requests upon Midwestern Telecommunications, Inc., (hereafter referred to as "Midwestern" or "the Company").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-833, that you answer the following data requests in writing and under oath within ten (10) days¹ after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify a document, "identify" means to provide a full and detailed description of the document. In lieu of

¹ While the 2007 amendments to 26 S.C. Code Regs. 103-833 allow the person upon whom interrogatories have been served twenty days to serve answers and objections, the ORS requests service of answers within ten days given the limited number of requests.

providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- I. That all information requested below, unless otherwise specified, shall be limited to Midwestern's actual and/or proposed South Carolina operations.
- II. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- III. That all responses to the data requests below be labeled using the same numbers as used herein.
- IV. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- V. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- VI. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to James McDaniel, of the South Carolina Office of Regulatory Staff.
- VII. That this entire list of questions be reproduced and included in front of each set of responses.
- VIII. That each question be reproduced and placed in front of the response provided.

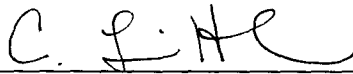
- IX. That Midwestern provide six (6) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that Midwestern provide an electronic version of the responses.
- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of Midwestern's responses, the Midwestern witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require Midwestern to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

REQUESTS:

- 1.1 Identify those states where Midwestern has been designated an Eligible Telecommunications Carrier ("ETC") pursuant to § 214(e) of the Telecommunications Act of 1996 and identify by docket or order number the state or federal regulatory decision granting such request.
- 1.2 Identify any states where Midwestern has requested ETC status but was denied.
- 1.3 Identify any states where Midwestern has a pending application for ETC status.
- 1.4 Is the application for ETC status filed with the South Carolina Public Service Commission by Midwestern in this docket comparable to the applications filed in other states? If not, please describe any differences.
- 1.5 Please describe the means by which Midwestern provides telecommunications services in South Carolina. For example, identify whether Midwestern utilizes resale, unbundled network elements, or its own facilities (i.e. not leased from an incumbent local exchange carrier).
- 1.6 If Midwestern utilizes any of its own facilities (i.e. not leased from another carrier), describe those facilities and their location.

- 1.7 In paragraph 5 of its application, Midwestern states that the Company “offers all of the supported services enumerated under Section 254(c) using facilities obtained as UNEs from Bell South” and thus the requirement of “facilities” as set forth in Section 214 (e)(1)(A) is satisfied. (A) Does the Company purchase the UNEs under a commercial agreement or pursuant to an interconnection agreement? (B). Please identify the leased portions of the network that the Company purchases from BellSouth. (e.g. switching, loop, port, etc.).
- 1.8 Does Midwestern currently provide Lifeline or Link-up services within South Carolina?
- 1.9 Could Midwestern provide Lifeline or Link-up services through a resale agreement?

July 3, 2007



C. Lessie Hammonds, Esquire
South Carolina Office of Regulatory Staff
1441 Main Street, Suite 300
Columbia, South Carolina 29201
(803) 737-0803
Fax: (803) 737-0895
lhammon@regstaff.sc.gov

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2007-32-C

IN RE:

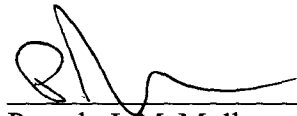
Midwestern Telecommunications, Incorporated)
Application for Designation as an Eligible)
Telecommunications Carrier for the Purposes)
of Receiving Federal Universal Service Support)
Pursuant to Sections 214 (e)(2) of the)
Telecommunications Act of 1996)

CERTIFICATE OF SERVICE

This is to certify that I, Pamela J. McMullan, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **OFFICE OF REGULATORY STAFF'S FIRST CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P.A.
Post Office Box 2285
Columbia, SC, 29202

Margaret M. Fox, Esquire
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, SC, 29211



Pamela J. McMullan

July 3, 2007
Columbia, South Carolina